## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF VERMONT

<b>JENNIFER</b>	A. CO	NNORS,
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**PLAINTIFF** 

v.

CASE NO. 2:10-cv-94

DARTMOUTH HITCHCOCK MEDICAL CENTER, DARTMOUTH MEDICAL SCHOOL, MARY HITCHCOCK MEMORIAL HOSPITAL, DARTMOUTH-HITCHCOCK CLINIC and TRUSTEES OF DARTMOUTH COLLEGE,

**DEFENDANTS** 

## STIPULATED DISCOVERY SCHEDULE/ORDER

The parties submit the following Discovery Schedule pursuant to Local Rule 26.1(b):

- 1. The parties shall serve initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) on or before August 27, 2010.
- 2. The parties shall serve all interrogatories and request for production on or before October 15, 2010.
- 3. Depositions of all non-expert witnesses shall be completed by <u>January 10</u>, <u>2011</u>.
- 4. Plaintiff shall submit expert witness reports on or before <u>September 1, 2010</u>.

  Depositions of plaintiff's experts shall be completed by <u>October 15, 2010</u>.
- Defendant shall submit expert witness reports on or before November 1, 2010.Depositions of defendant's experts shall be completed by <u>December 15, 2010</u>.
- 6. The Early Neutral Evaluation session shall be conducted on <u>January 12, 2011 at</u>
  10:00 a.m. The parties have agreed that <u>Potter Stewart, Jr., Esq.</u> will serve as the

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early neutral evaluator.

- 7. The parties shall serve all requests for admission on or before February 1, 2011.
- 8. All discovery shall be completed by <u>February 11, 2011</u> (no later than 8 months after filing of the Answer or Third-Party Answer).
- 9. Motions for joinder of parties and amendments to the pleadings shall be filed on or before November 1, 2010.
- 10. Motions, including summary judgment motions but excluding motions relating to the conduct of the trial, shall be filed on or before January 15, 2011.
- 11. This case shall be ready for trial by February 11, 2011.

Dated: <u>7/22/10</u> .	/s/ Norman E. Watts Norman E. Watts, Esquire Watts Law Firm, PC PO Box 270 Woodstock VT 05091 (802) 457-1020 wattslawfirmpc@gmail.com Attorney for Plaintiff
Dated: 7/22/10 .  /s/William D. Pandolph William D. Pandolph, Esq.	/s/Edward M. Kaplan Edward M. Kaplan, Esq.
Sulloway & Hollis PLLC 9 Capitol Street, PO Box 1256 Concord, NH 03302-1256	Sulloway & Hollis PLLC 9 Capitol Street, PO Box 1256 Concord, NH 03302-1256
(603) 224-2341 Attorney For Defendants	(603) 224-2341 Attorney For Defendants Admitted <i>Pro Hac Vice</i>
Dated:	
APPROVED and SO ORDERED:	U.S. District Judge